

# The Result Radio Group

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JERRY PAPENFUSS, PRESIDENT

<b>KAGE</b> AM - 1380 FM - 95.3 WINONA, MN	<b>KWNO</b> AM - 1230 FM - 99.3 WINONA, MN	<b>KBEW</b> AM - 1560 FM - 98.1 BLUE EARTH, MN	<b>KBRF/KZCR</b> AM - 1250 FM - 103.3 FERGUS FALLS, MN	<b>KJJK</b> AM - 1020 FM - 96.5 FERGUS FALLS, MN	<b>KPRW</b> FM - 99.5 PERHAM, MN
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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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In the Matter of

Creation of a Low  
Power Radio Service

MM Docket No. 99-25

RM-9208  
RM-9242

Comments of  
**Jerry Papenfuss – Owner**  
**Result Radio Group**

My name is Jerry Papenfuss. My wife and I own eleven radio stations in Minnesota. We have been radio broadcasters for almost forty years.

Low power FM is a very, very bad idea. The people who support low power FM are doing a terrible disservice to the minority and non-profit groups because they are not painting a clear picture of what low power FM can or cannot do. It is unbelievable to me that a Government Agency could propose something with so many bad ramifications without more research. I would think that we would learn from 80-90. This mistake is many times worse than 80-90.

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If the FCC moves ahead on low power FM, Congress should immediately step in and stop implementation of the plan.

The major responsibility of the FCC is to guard the integrity of the spectrum, and there is no way the FCC or anyone else can control the spectrum if thousands of new stations are added.

Enforcement will be impossible and interference will occur with the stations already on the air.

With low power, many groups or individuals that receive the license will be dissatisfied with how far the signal travels. They will then increase their power because they will know that no one is policing them. Our present broadcasters will receive interference and service to our listeners will be diminished.

The commitment to IBOC has been made. Low power FM will seriously damage the ability of digital radio to be successful.

Those who favor low power FM say that it will help minorities and community groups in the metropolitan area. It is my understanding that almost no low power licenses will be available in metropolitan areas.

Most of those who favor low power FM have no idea what it is like to run a radio station. I shudder to think of what many of those low power FM's would sound like. How much of the time would they be on the air? And, would their transmitter might be left on to cause interference?

Many of the licenses would go to radio groups who would use the airwaves for less than good purposes. Who will police what is said? Broadcasters do have many restrictions on what can be said and done on the air. I hesitate to think of what foul language will be used on many of the low power FM's, and how individuals and groups will attack others.

I know that low power FM will hurt small communities the most. These kinds of proposals always do. Rural America, America's small towns and American Agriculture have a constant challenge.

Low power FM will hurt Rural America because each rural community has the possibility of many low power stations. If a small commercial radio station loses some of its listeners, it may not have enough left to be an effective media. The station will not be able to sell as much advertising and may either go out of business or cut back its service to the community. I understand that low power FM's will not be allowed to sell advertising, but they will take listeners from small commercial radio stations.

Most local radio stations are doing a very good job of providing publicity to their local communities. There are very few organizations in our community that we don't provide help for during the year.

In addition, local radio stations provide local news, weather, and school reports, senior citizen and farm information. Local radio stations are the first lines of defense in case of severe weather.

The United States has the best broadcast system in the world. Why do we want to destroy it?